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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	Case No: CR 05 0254 CRB
)	
Plaintiff,)	UNITED STATES' REQUEST AND
)	[PROPOSED] ORDER FOR
v.)	ADDITIONAL TIME TO FILE
)	RESPONSE
DERA MARIE JONES,)	
a/k/a Derek Jones)	Next Date: April 5, 2005
)	Time: 2:15 p.m.
Defendant.)	Court: Hon. Charles R. Breyer

The United States respectfully requests this Court for additional time within which to file its response to the defendant's motion for a new trial filed on February 27, 2006. The defendant's motion, filed approximately three months after she was convicted, is lengthy and contains two declarations of fact, several transcript excerpts, and additional exhibits all requiring significant review. The United States also makes this request in part due to the need for continued research and expert consultation. Accordingly, the United States requests an additional three weeks to respond to the defendant's motion for a new trial.

Defense counsel, Elizabeth Falk of the Federal Public Defender's Office, is out of the district until March 24, 2006, and is therefore unavailable. The duty Federal Public

Defender declined to state a position on this motion on her behalf.

Should the Court grant the motion for additional time, the proposed briefing schedule would proceed with the United States' response due on April 12, 2006, the defendant's reply (if any) due on April 19, 2006, and a motions hearing before the Court on April 26, 2006 at 2:15PM.

DATED: March 22, 2006

Respectfully submitted,

KEVIN V. RYAN
United States Attorney

/s/
ROBERT DAVID REES
Assistant United States Attorney

~~PROPOSED~~ ORDER

For good cause shown, the briefing schedule for the defendant's Motion for a New Trial shall be altered such that the United States' response is due on April 12, 2006 and the defendant's reply (if any) is due on April 19, 2006. The Court vacates the current hearing date of April 5, 2006, and instead will hold a hearing on the motion at 2:15PM on April 26, 2006.

DATED: March 23, 2006

HON. CHARLES R. BREYER
United States District Judge

